

**UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

UNITED STATES OF  
AMERICA,

*Plaintiff-Appellee,*

No. 23-4650

Dist. Ct. No. 21-cr-460  
District of Maryland

v.

SAMUEL SULLIVAN, JR.,

*Defendant-Appellant.*

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**APPELLANT’S UNOPPOSED MOTION TO EXTEND  
BRIEF AND APPENDIX DEADLINES AND  
FOR REVISED BRIEFING ORDER**

Defendant-Appellant Samuel Sullivan, Jr. (“Appellant”), through counsel and pursuant to Local Rule 31(c), files this motion requesting that the Court extend by 30 days the deadline for his opening Brief and Appendix, and issue a revised Briefing Order extending the various other dates by 30 days, as well. In support, Appellant states:

1. On December 27, 2023 this Court issued its initial Briefing Order – Criminal, setting the deadline for Appellant to file his Brief and the Joint Appendix of January 31, 2024. Dkt. event 9.

2. Undersigned appointed CJA counsel is still in the process of collecting the various sealed documents that are part of the record below, and as a result anticipates being unable to meet the current January 31 deadline. Accordingly, good cause exists for an extension and Appellant requests a 30-day extension of his deadline for the Brief and Joint Appendix, to and through Friday, March 1, 2024, to give Appellant sufficient time to prepare and file papers that fully assist this Court in its task of appellate review.

3. Pursuant to Local Rule 27(a), counsel for Appellant has informed counsel for the United States via email of the intended filing of this motion. The United States does not oppose the relief requested and does not intend to file a response in opposition.

WHEREFORE, Appellant Samuel Sullivan, Jr. respectfully requests that the Court grant this Motion and issue a Revised Briefing Order setting a new deadline for his opening Brief and Joint Appendix of March 1, 2024, and adjusting the subsequent deadlines an equal number of days.

Respectfully submitted,

/s/ Michael F. Smith

Michael F. Smith

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**Samuel Sullivan, Jr.**

Dated: January 25, 2024